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September 27, 2013

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Ms. Beverly Kolenberg
Assistant Regional Counsel
Office of Regional Counsel, Region 2
U.S. Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 10007-1866

Dear Ms. Kolenberg:

The attached response is made on behalf of Sulzer Metco (US) Inc. (“SMUS”) in response to the July 31, 2013 Request for Information issued by Nicolletta Diforte, Senior Enforcement Policy Advisor, Emergency and Remedial Response Division.

The response to each inquiry follows the questions, which have been repeated below for your convenience. In certain instances, SMUS has asserted certain objections to the questions but, subject to such objections and without waiving the right to assert such objections in the future, SMUS has provided its response.

As you know, SMUS requested additional time to comply with the information request in light of the fact that we estimated that approximately 8,000 documents (consisting of nearly 80,000 pages of material) needed to be reviewed. Notwithstanding the shortness of time, SMUS has made diligent efforts to complete this response; however, the possibility exists that additional responsive documents and information may be identified after this response is submitted. If that happens, SMUS will supplement this response or revise any answers provided in its response.

Enclosed with this response is a disc containing SMUS’s responsive documents for questions 3(b), 3(g), 4, 6, 7, 8, 9, 10, 11, and 13.¹ Numerous Engineering drawings responsive to question 4 are in the process of being copied electronically; a disc with those documents will follow as soon as it is available.

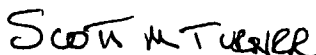
¹ The materials contained on the responsive document discs should be viewed in their entirety. Although the materials on the discs are organized in folders by question, our categorizations do not represent the exclusive responsive documents to a particular question or set of questions.



Ms. Beverly Kolenberg
September 27, 2013
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Note that SMUS contests EPA's assertion that it is "potentially liable as an owner or operator of a facility at the time of disposal of hazardous substances at the Site." SMUS does not own and has not formerly owned any property within the Site as delineated on the Site Location Map accompanying EPA's July 31, 2013 Request for Information. Not only has SMUS not owned any property within the Site, there is no evidence of its involvement in disposal of hazardous substances at the Site.

Very truly yours,

A handwritten signature in black ink that reads "Scott M. Turner". The signature is written in a cursive, slightly stylized font.

Scott M. Turner

SMT/mc
Enclosures
cc: Jennifer LaPaloma (EPA)

**SULZER METCO (US) INC.
RESPONSE TO
REQUEST FOR INFORMATION**

1. a. *State the correct legal name and mailing address of your Company.*

RESPONSE

Sulzer Metco (US) Inc. ("SMUS")
1101 Prospect Avenue
Westbury, NY 11590-0201

- b. *State the name(s) and address(es) of the President, Chief Executive Officer and the Chairman of the Board (or other presiding officer) of the Company.*

RESPONSE

SMUS objects to this question to the extent that it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

President and CEO:
Friedrich Herold
1101 Prospect Avenue
Westbury, NY 115901-0201

Chairman of the Board:
Cesar Montenegro
Zurcherstrasse 12
8401 Winterthur
Switzerland

- c. *Identify the state and date of incorporation of the Company and the Company's agents for service of process in the state of incorporation, and in New York State.*

RESPONSE

SMUS objects to this question to the extent that it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

State and date of Incorporation: Delaware; Nov. 21, 1985 (assets of Metco Division of Perkin-Elmer acquired in Sept. 1994 and placed into previously existing Sulzer company which changed name to SMUS).

Agent for Service of Process in DE and NY: CT Corporation

- d. *If your Company is a subsidiary or affiliate of another corporation or entity, identify each of those other corporations or entities and for each, the President, Chief Executive Officer and Chairman of the Board. Identify the state of incorporation and agents for service of process in the state of incorporation and in New York State for each corporation identified in your response to this question.*

RESPONSE

SMUS objects to this question to the extent that it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS is a wholly owned subsidiary of Sulzer (US) Holding Inc., a Delaware Corporation whose agent for service of process in DE and NY is CT Corp. The President and CEO of Sulzer US Holding is Kelli Edell, and its Chairman of the Board is Juergen Brandt.

2. *Identify the address, Section, Block and Lot numbers, and the size of each property (hereinafter, "Property" or "Properties") that your Company either presently owns*

and/or formerly owned within the Site from the date your Company, or any related company had an ownership interest. (See Definitions section for terms.)

RESPONSE

SMUS objects to this question to the extent that it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

SMUS does not own and has not formerly owned any property "within the Site" as delineated on the Site Location Map. Notwithstanding that and the foregoing objections and expressly subject thereto, SMUS is responding to this Request for Information with regard to the following two properties:

1. Address: 1101 Prospect Avenue, Westbury, NY ("Prospect Avenue property")
Section 11, Block 329, Lot 369
Size: 6.88 Acres
2. Address: 325 Duffy Avenue, Hicksville, NY ("Duffy Avenue property")
Section 11, Block H, Lots 112 and 484
Size: 6.79 Acres
3. *For each Property identified in response to question 2. in which your Company has and/or had an ownership interest currently or in the past, please identify:*
 - a. *The date your Company acquired an ownership interest. An ownership interest includes, but is not limited to, fee owner, lessor or lessee, licensee and/or operator;*

RESPONSE

SMUS objects to this question to the extent that it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS acquired the Prospect Avenue property and the Duffy Avenue property from Perkin-Elmer Corporation, doing business as the Metco Division of Perkin-Elmer, in connection with the September 1994 acquisition of the Metco Division of the Perkin-Elmer Corporation by Sulzer Inc.

b. The name and address of all other current and/or previous owners;

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS refers EPA to the 60 Year Chain of Title for the Duffy Avenue property included in the enclosed disc containing the SMUS responsive documents.

SMUS sold the Duffy Avenue property to First Industrial L.P. on December 9, 1997. First Industrial L.P. is located at 575 Underhill Boulevard, Syosset, New York 11791.

The former Perkin-Elmer Corporation's principal executive offices have been relocated to 301 Merritt 7, P.O. Box 5435, Norwalk, CT 06859.

SMUS is the current owner of the Prospect Avenue property. On or about June 1, 1998, SMUS entered into a transaction with the Nassau County Industrial Development Agency ("Agency") whereby the Agency became the fee title owner of Prospect Avenue property for the purpose of issuing industrial development revenue bonds, and leased back the Prospect Avenue property for a term set to expire on or around June 30, 2013, at which time the fee title to the Prospect Avenue property shall be conveyed back to SMUS from the Agency.

c. All individuals or entities that have leased, subleased or otherwise operated at each Property at any time currently or in the past, and identify the dates (month and year) that each such individual or entity began and ended its leasehold interest or its operations;

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or

likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

After its sale of the Duffy Avenue property, SMUS leased that property from the new owner until SMUS ceased operations there on June 30, 1999. Otherwise, SMUS is not aware of any lessees or tenants at the Duffy Avenue property.

By lease dated October 1, 2003, SMUS leased the second (2nd) floor of the Prospect Avenue property to Excel Importing Corp., a New York corporation for a period of two (2) years and six (6) months.

- d. *Any portion of any Property which was transferred or sold, and the block and lot number, the date of the transfer or sale, the sale price and the entity that acquired the Property;*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS has no knowledge of any transfer or sale of any portion of the two properties.

- e. *The relationship, if any, between your Company and each of the individuals and/or other entities identified as having leased or operated at each Property;*

RESPONSE

SMUS refers EPA to its response to questions 3a., 3b. and 3c.

- f. *Your Company's involvement in all operations conducted by each lessee and/or other individual or entity identified in response to question 3c., above; and*

RESPONSE

None; SMUS refers EPA to its response to question 3c.

- g. *For each Property, provide all documents relevant to your responses to questions 3a.- 3f., above, and provide copies, including, but not limited to, copies of surveys, title search documents, deeds, rent rolls, leases and correspondence.*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authorities as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site; and to the extent that the request calls for disclosure of information protected by the attorney-client and work product privileges.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS refers EPA to the enclosed disc containing the SMUS responsive documents.

4. *Provide copies of all maps, building plans, floor plans and/or drawings for each Property identified in response to question 2., above. Your response to this question should include, but not be limited to, providing plumbing and drainage system plans for all structures on each Property.*

For both current (if still in operation) and past operations during the period of time that the Company was at a Property, please identify and provide a description of

- a. *all surface structures and features (e.g., buildings, above-ground storage tanks, paved, unpaved areas and parking lots, and dates when paved areas were paved);*
- b. *all past and present plumbing systems, above and below-ground discharge piping, sumps, storm water drainage systems, sanitary sewer systems, septic tanks, dry wells, subsurface disposal fields, and underground storage tanks ; and*
- c. *all currently existing and previously existing chemical and industrial hazardous substance storage, transfer, spill and disposal areas.*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authorities as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS refers EPA to the enclosed disc containing SMUS's responsive documents.

5. *For each Property identified in question 2., above, at which your Company conducted operations, describe in detail the manufacturing processes and/or other operations that your Company conducted at the Property, and identify the years during which your Company conducted operations there. If those operations were not constant throughout your Company's operations, describe the nature of all changes in operations, and state the year of each change. If detailed information about your Company's operations is not available, provide, at a minimum, a general description of the nature of your Company's business at the Property, the years of operation, the type of work your Company conducted, and the number of employees for all the operations.*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authority as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site; and to the extent that the request calls for disclosure of information protected by the attorney-client and work product privileges.

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

SMUS began operations at the two properties in September 1994. SMUS ceased operations at the Duffy Avenue property as of June 30, 1999. The spray gun and systems equipment manufacturing operations at the Duffy Avenue property were transferred to the Prospect Avenue property in 1999.

Prospect Avenue property: The property contains a 170,000 square foot, one/two-story brick building situated on approximately 9 acres of land. It originally was constructed in 1954. One building addition was completed since 1985, and a two-store office addition was completed in 1999. Facility operations involve the manufacture of metal and ceramic powders for use in the thermal spray coatings industry, as well as the manufacture of thermal spray guns and parts. Site operations have also included swaging and drawing (the compression and stretching of wire that has been filled with metal powder pellets), blending of metallic or ceramic powders with a lacquer and glue, laboratory testing, research and development, thermal spray application development, thermal spray coating operations, and corporate functions. The building is divided into several interior sections, including a warehouse, shipping area, powder laboratory, quality assurance/quality control laboratory, powder, wire, and equipment manufacturing, boiler room, computer room, cafeteria, and office space.

Duffy Avenue property: This facility was engaged in the manufacture of parts and equipment for the thermal spray coatings industry. The subject property contained a 100,000 square foot, one-story brick building situated on approximately 6.5 acres of land. Between 1951, when the building was originally constructed and 1978, the subject facility was occupied by T.O.D. Manufacturing Company who reportedly was involved in the plating of boat parts and possibly fish hooks. The subject property was purchased by The Perkin-Elmer Corporation in December 1978 from New England Mutual Life Insurance Company. Site operations involved the manufacture of specialized spray guns and spray gun parts used to apply thermal liquid metal coatings. Site activities include machining, degreasing, tumbling, and testing. The subject building was divided into several interior sections, including machining and drilling, assembly and inspection, stock rooms, boiler room, maintenance room, a cafeteria, and office space.

6. *With respect to industrial wastes at a Property:*

- a. *List all industrial wastes that were used, stored, generated, handled or received by your Company at the Property. Your response to this question should include, but not be limited to, use, storage, generation and/or handling of trichloroethylene ("TCE"), tetrachloroethylene ("PCE"), 1,1,1-trichloroethane ("1,1,1-TCA") and other chlorinated or non-chlorinated solvents. Be as specific as possible in identifying each chemical, and provide, among other things, the chemical name, brand name, and chemical content;*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome.

Notwithstanding this objection and expressly subject thereto, SMUS provides the following:

SMUS refers EPA to its disc of responsive documents. The responsive documents include Tier II reports, EPA Form R reports, waste manifests, environmental reports and other documents.

- b. *State when each industrial waste identified in your response to question 6a., above, was used, stored, generated, handled or received, and state the volume of each industrial waste used, stored, generated and/or handled on an annual basis; and*

RESPONSE

SMUS refers EPA to its response in question 6a.

- c. *Describe the activity or activities in which each industrial waste identified in your response to question 6a., above, was used, stored, handled or received.*

RESPONSE

SMUS refers EPA to its response in question 5.

7. *Describe in detail how and where the industrial wastes identified in response to question 6., above, were disposed. For each disposal location and method, state the nature and quantity of the material disposed of on an annual basis. For those time periods when a precise quantity is not available, provide an estimate.*

RESPONSE

SMUS refers EPA to its response in question 6a.

8. *Describe in detail any knowledge your Company has about intentional or unintentional disposal of industrial wastes at each Property identified in response to question 2., above, including, but not limited to, TCE, PCE and/or other chlorinated or non-chlorinated solvents or wastes containing such solvents, at any time currently or in the past. Your response should include instances in which industrial wastes were spilled or otherwise disposed onto or into the floors or the ground from septic systems, pipes, drains, drums, tanks, or by any other means. Provide copies of all documents relevant to your response.*

RESPONSE

SMUS is not aware of any release, spill, discharge or disposal of the enumerated substances at either property during SMUS's ownership and operation. Information concerning waste generation and off-site treatment, storage and disposal facilities is contained in the Toxic Chemical Release Inventory Reporting Form R reports, Annual Generator reports, waste manifests, and other documents contained on the discs including SMUS's responsive documents.

9. *Identify all leaks, spills, or releases of any kind of any industrial wastes (including, but not limited to, TCE and PCE or other chlorinated or non-chlorinated solvents or wastes containing such solvents) into the environment that have occurred, or may have occurred, at or from the Property, including any leaks or releases from drums and other containers. Provide copies of all documents relevant to your response.*

RESPONSE

SMUS refers EPA to its response to question 8.

10. *Explain whether any repairs or construction were implemented to address any leaks, spills, releases or threats of releases of any kind, the nature of the work and the dates of any such work. Provide copies of all analyses, characterizations, environmental assessments or studies or any report or other description of any investigations, removal actions, remedial activities, or any other work conducted by your Company or by any other party on your Company's behalf relating to industrial wastes released at or from any Property and/or the Site. If any copies of the records requested in this question are available electronically, kindly submit your answer to this question on a disk.*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome.

Notwithstanding this objection and expressly subject thereto, SMUS provides the following:

SMUS refers EPA to the environmental investigations and remedial reports contained in SMUS's responsive documents provided in connection with its response to question 8.

11. *Provide copies of all insurance policies held and indemnification agreements entered into by the Company which may potentially indemnify the Company against any liability which it may be found to have under CERCLA for releases and threatened releases of hazardous substances at and from the Property. In response to this request, please provide not only those insurance policies and agreements which currently are in effect, but also those that were in effect during any portion of the time the Company conducted operations at, or held a property interest. Your response should also identify the specific Property related to each policy and/or agreement.*

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; and to the extent that the request calls for disclosure of information protected by the attorney-client and work product privileges.

Notwithstanding these objections and expressly subject thereto, SMUS provides the documents on the disc of SMUS's responsive documents.

12. *State the names, telephone numbers and present or last known addresses of all individuals whom you have reason to believe may have knowledge, information or documents regarding the use, storage, generation, disposal of or handling of industrial wastes at the Site, the transportation of such materials to the Site, or the identity of any companies whose material was treated or disposed of at the Site.*

RESPONSE

SMUS objects to this question to the extent that it calls for information that is subject to attorney-client privilege or as work product. SMUS objects to the question to the extent that it calls for disclosure of personal information (such as home contact information) for SMUS's current or former employees. It is not SMUS's policy to provide confidential employee or former employee home address and telephone information in public documents. SMUS hereby asserts a claim that such information is "Company Confidential" pursuant to sections 104(e)(7)(E) and (F) of CERCLA, Section 30007(b) of RCRA and 40 C.F.R. Section 2.203(b).

Notwithstanding these objections and expressly subject thereto, SMUS provides the following:

Given that SMUS never conducted any operations at the Site as delineated on the Site Location Map, it is not in a position to identify any individuals with possible knowledge of the activities of which EPA inquires. However, the following individuals may have information or knowledge regarding the use, storage, generation, disposal of or handling of industrial wastes at the two properties at which SMUS conducted operations. In addition to the information below, SMUS refers EPA to the discs of SMUS's responsive documents.

Environmental Managers

Alfonso Rolli
c/o Sulzer Metco (US) Inc.
1101 Prospect Avenue
Westbury, NY 11590
516-334-1300

Peter DiPietrantonio (former employee of SMUS)

151-56 25 Drive
Flushing, NY 11354
718-866-6905

John DeTomasso (dates of employment: 6/7/2000 - 7/27/2001)
Last known address and phone:
101 Plad Blvd
Holtsville, NY 11742
631-207-1515

Michael Lydon (dates of employment: 2/4/1997 - 5/10/2000)
Last known address and phone:
16 Arbor Lane
Dix Hills, NY 11746
631-271-1997

Constance Conroy (employed prior to 1997)
Address unknown.

Gregory Wuest
Director, Materials Quality Environment Safety and Health
Sulzer Metco (US) Inc.
1101 Prospect Ave.
Westbury, NY 11590 USA
516-338-2217

Facilities Managers

Michael D'Arpa
c/o Sulzer Metco (US) Inc.
1101 Prospect Ave.
Westbury, NY 11590
516-334-1300

Kevin Rodgers (Former facilities manager)
6 Diana Hill Court
Huntington, NY 11743
516-424-0096

Patrick A. Tighe (Former facilities manager)
Joseph Macri (Former facilities manager)
Addresses unknown.

Environmental Consultants who performed work at the properties

Halley I. Moriyama
Carolyn Scott
ENSR Consulting and Engineering
2 Technology Park Drive
Westford, Massachusetts 01886-3140

Michael Larson
Christine Hylemon
Nancy Irwin
Cynthia Salisbury
Kay Breeden
Booz Allen & Hamilton, Inc.
Last known address:
4330 East West Highway Bethesda, MD 20814
301-951-2200

Glenn Netuschil
Tom C. Eng
Victoria Kramer
William J. Holubowich
Robert J. Mozer
Thomas Lobasso, Jr.
Arcadis Geraghty & Miller, Inc.
125 East Bethpage Road
Plainview, New York 11803
516-249-7600

J. Robert Holzmacher
Alison Walter
P.W Grosser Consulting & Hydrogeologist, P.C.
630 Johnson Avenue, Suite 7
Bohemia, NY 11716
631-589-6353

Robert E. Lee
Joseph J. Salvo
Donnelly Engineering
55 Southern Boulevard
Nesconset, NY 11767
516-979-7788

13. *If you have information or documents which may help EPA identify other companies that conducted operations, owned property, or were responsible for the handling, use,*

storage, treatment, or disposal of industrial wastes that potentially contributed to chlorinated solvent contamination of the Site, please provide that information and those documents, and identify the source(s) of your information.

RESPONSE

SMUS objects to this question to the extent that it is unreasonable in scope, overly broad and unduly burdensome; it calls for information not reasonably relevant to the Site or likely to lead to relevant facts; it is not within the scope of the government's CERCLA Section 104(e) authorities as it does not relate to the identification, nature and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site, the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at the Site, or relate to the ability of a person to pay for or to perform a cleanup of a release or threatened release of hazardous substances, pollutants or contaminants at the Site; to the extent that the request calls for disclosure of information protected by the attorney-client privilege or as work product; and to the extent it calls for speculation.

Notwithstanding these objections, and expressly subject thereto, SMUS's provides the following:

SMUS refers EPA to the disc of SMUS's responsive documents.

14. *Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information. In addition, state whether each such person has personal knowledge of the answers provided.*

RESPONSE

Gregory Wuest
Director, Materials Quality Environment Safety and Health
Sulzer Metco (US) Inc.
1101 Prospect Ave.
Westbury, NY 11590 USA
516-338-2217

Alfonso Rolli
c/o Sulzer Metco (US) Inc.
1101 Prospect Avenue
Westbury, NY 11590
516-334-1300

Michael D'Arpa
c/o Sulzer Metco (US) Inc.
1101 Prospect Ave.
Westbury, NY 11590
516-334-1300

Janis Gzik
c/o Sulzer Metco (US) Inc.
1101 Prospect Ave.
Westbury, NY 11590
516-334-1300

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New York

County of Nassau

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information regarding the New Cassel/Hicksville Site) and all documents submitted herewith, and that I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

W. Gregory Wuest

NAME (print or type)

Director, Quality Environmental
Safety and Health

TITLE (print or type)

W. Gregory Wuest
SIGNATURE

Sworn to before me this

26 day of September, 2013

Judith Becker

